

State Water Resources Control Board
Division of Drinking Water

TO: Pamela Creedon, Executive Officer
Central Valley Water Board

FROM: Darrin Polhemus, Deputy Director
DIVISION OF DRINKING WATER



DATE: June 30, 2017

SUBJECT: Region-wide Municipal and Domestic Supply (MUN) Beneficial Use
Evaluation Process in Agriculturally (Ag) Dominated Surface Water
Bodies

Based on review of available documents and discussions with your staff, the proposed amendment has laid out a process that appropriately identifies constructed and modified ag dominated water bodies that have not previously provided, nor are expected in the future to provide, municipal and domestic supply consistent with the intent of exception 2b of the Sources of Drinking Water Policy (Resolution 88-63). It can be a reasonable outcome, after following the evaluation process detailed in basin plan amendment, to de-designate the MUN use from these water bodies as long as discharges are monitored to assure compliance with all relevant water quality objectives. From the perspective of the Division of Drinking Water, and its role in protecting sources waters, we agree with the basin plan amendment's requirement that an applicant initiating a new discharge or making a material change to the character, location or volume of an existing discharge bears the burden of ensuring that information (e.g., water quality data) are available to ensure that the change would not result in unreasonable impacts to water quality in downstream water bodies. In addition, the designation of a Limited MUN use based on inherent characteristics appropriately balances the potential for future use with the reality of existing conditions. Our joint primary interest is that the process ensures adequate protection of both potential and existing MUN use in water bodies downstream of constructed agricultural drains as well as within and downstream of water bodies that receive a Limited MUN designation. Based on our review of the basin plan amendment, the monitoring and surveillance program identified in combination with the regulatory programs in place appropriately provide the needed level of protection.

cc: Jeanne Chilcott, Planning Program Manager, CVRWQCB
Adam Laputz, Assistant Executive Officer, CVRWQCB
Robert Brownwood, Assistant Deputy Director, DDW